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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

FRONT SIGHT MANAGEMENT, LLC

Debtor.

FRONT SIGHT MANAGEMENT, LLC,
A NEVADA LIMITED LIABILITY
COMPANY

v.

LAS VEGAS DEVELOPMENT FUND
LLC, A NEVADA LIMITED
LIABILITY COMPANY, et al.

Case No. BK-S-22-11824-ABL
Chapter 11

Adversary Case No. 22-01116-abl

**DECLARATION IN SUPPORT OF
OPPOSITION TO DEBTOR'S AMENDED
MOTION FOR ENTRY OF AN ORDER
CONFIRMING TERMINATING
SANCTIONS ORDER IS VOID AS A
VIOLATION OF THE AUTOMATIC STAY
OR, IN THE ALTERNATIVE, MOTION
FOR RELIEF FROM ORDER PURSUANT
TO FEDERAL RULE OF CIVIL
PROCEDURE 60(b)**

Brian D. Shapiro, hereby states:

1. Affiant is bankruptcy counsel for Las Vegas Development Fund, LLC and Robert Dziubla within this adversary proceeding. Unless otherwise stated on information and belief, I have personal knowledge of the statements contained herein. I am competent to testify to the same.
2. Affiant is the owner and managing member of the Law Office of Brian D. Shapiro, LLC.

- 1 3. Affiant has been appointed and continues to be appointed by the Department of
2 Justice, Office of the United States Trustee to function as a Chapter 7, Chapter 11 and
3 Subchapter V Trustee within bankruptcy proceedings in the State of Nevada.
- 4 4. As a Trustee, Affiant has retained BG Law LLP (and previously known as Brutzkus
5 Gubner Rozansky Seror Weber, LLP) to represent him in the in the bankruptcy cases
6 of Lucky Dragon Hotel & Casino, LLC (18-10792) and Generation Next (19-17921).
7 Such cases are still pending.
- 8 5. After the filing of the Debtor's bankruptcy case and after the State Court heard
9 argument on the motion for terminating sanctions, Affiant was retained by Las Vegas
10 Development Fund, LLC to represent its interest within the Front Sight Management,
11 LLC Bankruptcy Case. After the Debtor filed a notice of removal of the State Court
12 Action to Bankruptcy Court, which created this adversary proceeding, Robert Dziubla
13 also retained Affiant to represent his interest in this adversary proceeding.
- 14 6. A true and correct copy of the transcript of the hearing on the motion for terminating
15 sanctions and corresponding Court Order, which I obtained from the State Court is
16 attached to the Opposition as Exhibit 1 and Exhibit 2, respectfully.
- 17 7. I declare under penalty of perjury under the Laws of the United States and the State of
18 Nevada that the foregoing is true and correct.
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21 DATED 8-17-2022

/s/ Brian D. Shapiro
BRIAN D. SHAPIRO